



ATLANTA

CINCINNATI

COLUMBUS

NEW YORK

CHICAGO

CLEVELAND

DAYTON

WASHINGTON, D.C.

April 28, 2021

Via ECF

Hon. Leda Dunn Wettre
United States Magistrate Judge
United States District Court, District of New Jersey
50 Walnut St., Room MLK 3C
Newark, NJ 07101

Re: Lara, et al., v. Puff Bar, et al., Case No. 2:20-cv-08030-SDW-LDW

Dear Judge Wettre:

We write as counsel for Defendants Puff Bar, Nick Minas, and Patrick Beltran, with the consent of counsel for Plaintiffs Ruth Lara and her minor child J.S., regarding the Court's Letter Order dated March 4, 2021 (ECF No. 60), which, among other things, set the deadline for the submission of the parties' joint discovery plan for today, April 28, 2021.

The parties have met and conferred and have been working in earnest on the proposed joint discovery plan, but they respectfully request the Court's indulgence that they be permitted to submit it tomorrow, April 29, 2021. This additional time will allow the parties to more fully reconcile their views on how discovery should proceed in this case, and will reduce the need for the Court to resolve those issues at the initial scheduling conference next week.

Counsel thank the Court for its understanding, and are available to discuss should the Court wish to do so.

Respectfully submitted,

/s/ Brian Keahi Steinwascher

cc: All Counsel of Record via ECF

Brian.Steinwascher@ThompsonHine.com Fax: 212.344.6101 Phone: 212.908.3916

THOMPSON HINE LLP
ATTORNEYS AT LAW

335 Madison Avenue
12th Floor
New York, New York 10017-4611

www.ThompsonHine.com
Phone: 212.344.5680
Fax: 212.344.6101